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July 2, 2024

VIA ECF

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Reclaim the Records and Alec Ferretti v. United States Department of State*
No. 23 Civ. 1471 (JMF)

Your Honor:

I am a partner at Beldock Levine & Hoffman LLP. Mr. Benjamin Meyers, the author of the Plaintiffs' papers, was just released from Bellevue Hospital last night. On June 24th he went for an examination at Gouverneur Hospital because the illness discussed at Dkt. 48 was getting worse. They performed tests and determined that Mr. Meyers needed to be in the care of a cardiologist immediately. He was then transferred to Bellevue where he remained for the last week. Mr. Meyers long term prognosis is good, but as he was just released from the Hospital last night, it is likely to take a couple of weeks for him to be back to full strength.

We respectfully request a 30-day extension of time reply to the Government's opposition to our cross-summary judgment motion. The Government consents to this request. This will allow Mr. Meyers to complete the briefing on this matter, or if he is unable, for another attorney to get up to speed and complete the briefing.

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We apologize for the inconvenience this causes to the Court and the parties. Should this request be granted, the plaintiffs' reply would be filed by August 2, 2024. Presently, the reply is due July 3, 2024. There was one previous request for an additional week for this reply, which was granted based on the same illness, the seriousness of which was not then known.

We thank the Court for its attention to this matter.

Respectfully submitted,



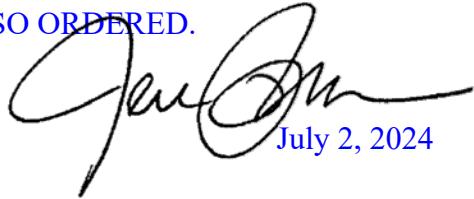
David B. Rankin

cc: Defendant's counsel (by ECF)

Application GRANTED. The Court wishes Mr. Meyers well. Given the length of time for which these motions have been pending, however, the Court will not grant any further extensions, no matter the reason.

Accordingly, to the extent Mr. Meyers believes he may not be able to complete the briefing by the now-extended deadline of August 2, 2024, Plaintiff should promptly make arrangements for another attorney to take on the task. The Clerk of Court is directed to terminate ECF No. 50.

SO ORDERED.



July 2, 2024